**Housing Services Insurance - Privacy Notice**

Contents insurance is designed to help protect your possessions. The Council does not cover your contents as part of the tenancy agreement.

The Council has teamed up with Thistle Tenant Risks who provide specialist tenants contents insurance policies. Thistle Tenant Risks Contents Insurance is a specialist insurance scheme and all tenants living in social and affordable housing are eligible to apply. Thistle Insurance Services Limited is authorised and regulated by the Financial Conduct Authority FRN 310419. Registered in England under No. 00338645. Registered office: Rossington’s Business Park, West Carr Road, Retford DN22 7SW. Thistle Insurance Services Ltd is part of the PIB Group.

This Privacy Notice sets out how the information you provide to the Council will be used and shared with Thistle and their Underwriters.

This Privacy Notice explains what personal information we collect about you, how and why we use it, who we disclose it to, and how we protect it in compliance with our legal obligations under the General Data Protection Regulation as incorporated into UK law (UK GDPR) and the Data Protection Act 2018.

**What we do with your personal data**

The Council will only process your personal data for the purpose for which it is collected; to process your application, payments and claims made in respect of the Contents Insurance. We use this personal data for the provision of information and services or the performance of the contract.

We may use your personal data for other similar purposes, including marketing and communications, but that will only occur if we have your consent or where, as a current or previous user of our services, we rely on a legitimate interest justification for doing so.

You have a right at any time to stop us from contacting you for marketing purposes. Please contact us to do so.

We may record or monitor calls for training purposes, to improve the quality of our service and to prevent and detect fraud.

**What information we collect**

We collect a range of information including some or all of the following:

* Name;
* Address,
* Telephone number and email address;
* Details of the Insurance Cover requested;
* Details of the Premiums

**Why we collect your information**

We use your data to:

* We use this personal data for the provision of information and services in respect of the Insurance Cover
* To enable Thistle and their Underwriter to assess the insured risks;

**Who we share information with**

We may share information about you to third parties where permitted or required by law to do so for all lawful purposes as specified in this notice:

* Thistle Tenant Risks, their Underwriters and Insurance platform providers
* Income Team - Housing services
* Other Croydon Council teams so they can carry out their statutory roles and support our service (e.g. Housing Services, Social Services, Complaints, Business Intelligence, Corporate Finance, Legal Services, IT Services, Quality Assurance & Risk and Insurance Services)
* Regulators, law enforcement agencies, fraud and crime prevention and detection agencies and compulsory insurance databases. We will only disclose your personal information in connection to the extent required or permitted by law.

Staff in each area will only access the personal information that is essential to carry out their work and statutory functions but may share data between the respective teams where this is necessary to provide you with services

**The lawful basis on which we use this information**

The legal basis for processing your personal information are:

* Compliance with our legal obligations
* Tasks carried out in the public interest or in the exercise of official authority
* Contract for the supply of services; and/or
* Authorised Third Party ie Power of Attorney

**Collecting this information**

Whilst the majority of information provided to us is mandatory due to compliance with a legal obligation, some of it is provided to us on a voluntary basis. To comply with the UK GDPR, we will inform you whether you are required by law to provide certain information to us; if you do have a choice to provide information that is not mandatory, your explicit consent will be requested. You do have the right to withdraw your consent if this is applicable to processing your data. If this is the case, we will let you know.

We will only ask for personal information that is necessary to enable us to deliver our services in compliance with our legal duties in the provision of the insurance you have purchased and in accordance with the relevant Data Protection legislation.

**Storing this information**

Personal data will not be retained for longer than necessary in relation to the purposes for which they were collected. There is usually a legal reason for keeping your personal information for a set period of time – this ranges from months for some records to decades for more sensitive records.

For example, if you live in one of our properties, or have become a leaseholder or freeholder, we will hold information about you for the duration of your tenancy. If you move and are no longer a resident within the borough, we will usually keep records about you for up to 6 years. Digital records will remain on digital files as property history for the duration that we maintain an interest in a property.

If you would like to know more about how we store your data, please contact us - [informationmanagement@croydon.gov.uk](mailto:informationmanagement@croydon.gov.uk).

**Providing us with accurate information**

It is very important that you provide us with accurate information to enable us to process your application more quickly. If any of your details have changed, or change in the future, please inform us as soon as possible so that we can update your records.

If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information.

**Requesting access to your personal data**

Under UK GDPR and the Data Protection Act 2018, you have the right to request access to information that we hold about you. To make a request for your personal information, contact the Council’s Information Management Team at SAR@croydon.gov.uk.

**Further information**

The UK GDPR and Data Protection Act 2018 give you a number of rights to control what personal information is used by us and how it is used by us. Information about your individual data rights is listed in the Council’s Privacy Notice.

If you have any questions or concerns about the way we collect, store or use your personal information, please contact in the first instance on 020 8726 6000.

For advice about data protection issues, you can contact the Information Commissioner’s Office (ICO) at www.ico.org.uk

We reserve the right to amend this Privacy Notice at any time and will keep it under review. If we do make any changes, we will post the current version to our website at this address.

Last updated: September 2021